

RICHARD JAFFE, ESQ.

Subject to pro hac vice admission

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JOHN STOCKTON, RICHARD
EGGLESTON, M.D., THOMAS T. SILER,
M.D., DANIEL MOYNIHAN, M.D.,
CHILDREN'S HEALTH DEFENSE, a not-
for-profit corporation, AND JOHN AND
JANE DOES, M.Ds 1-50,
Plaintiffs,

v.

ROBERT FERGUSON, Attorney General
of the State of Washington, AND KYLE S.
KARINEN, Executive Director of the
Washington Medical Commission,
Defendants.

Case No: 2:24-cv- 00071-TOR

**CONSOLIDATED MOTION FOR
PRO HAC VICE ADMISSION AND
MOTION TO EXPEDITE ON
THE ADMISSION OF RICHARD
JAFFE**

**March 15, 2024
Without Oral Argument**

CONSOLIDATED MOTION FOR PRO HAC VICE ADMISSION AND MOTION TO
EXPEDITE

Richard Jaffe states as follows:

1. Movant Richard Jaffe seeks pro hac vice admission to this case.
2. Richard Jaffe has an office address and phone number as listed in the caption of this case. Mr. Jaffe was admitted to the New York Bar in 1980, the Texas Bar in 1993, and the California Bar in 2013. He is also admitted to the bar of the U.S. Supreme Court, the Ninth Circuit, and several district courts in California and New York.
3. There are no pending disciplinary sanction actions against Mr. Jaffe, and he has never been the subject of a disciplinary sanction by any court or bar association.
4. Eastern District of Washington admitted attorney Todd S. Richardson will be local and co-counsel on this case. The address is as listed in the caption and the signature page.
5. The pro hac vice applicant has a strong background in First Amendment and censorship issues which are the subject of this case, as well knowledge of the substantive issues relating to Covid policy.
6. Mr. Jaffe is pro hac vice admitted in a Medical Commission case and a superior court case with Mr. Richardson involving Plaintiff Richard Eggleston and is thus familiar with the Commission's effort to sanction physicians for speaking out against the mainstream Covid narrative.

- 1 7. In addition, Mr. Jaffe has been involved in several prior federal Covid
2 misinformation cases involving the California Medical Board, one of which,
3 *Hoang v. Bonta* resulted in a preliminary injunction against the California
4 Covid misinformation law, which law was recently repealed in part because of
5 the preliminary injunction obtained in *Hoang* and a related case.
6
7 8. Robert F. Kennedy, Jr. is co-counsel with applicant on the *Hoang* case and
8 another recently filed similar California case.
9
10 9. Applicant is filing this Motion to Expedite because he intends to file a
11 preliminary injunction motion in the next two weeks, and would like to be
12 admitted quickly so he can file the injunction papers (which requires a pro hac
13 vice order so that the clerk's office can link his ECF account to this district's
14 ECF system) and that he can present argument at the hearing of the motion.
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17 WHEREFORE the movant Richard Jaffe together with local and co-counsel,
18 Todd S. Richardson, and the Plaintiffs herein request that this Motion for Pro Hac Vice
19 admission be granted.
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21 March 7, 2024
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CONSOLIDATED MOTION FOR PRO HAC VICE ADMISSION AND MOTION TO
EXPEDITE


Respectfully submitted,



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